REMARKS

Favorable reconsideration of this application is respectfully requested. Claims 1-33 are pending, none of the claims having been amended by way of the present Response.

In the outstanding Office Action, Claims 1-33 were rejected as being unpatentable over Callahan (U.S. Publication No. 2002/0157023) in view of Sheynblat (U.S. Patent No. 6,677,894) and Nussbaum (U.S. Patent No. 6,779,154).

In reply, Applicants respectfully traverse this rejection for substantially the same reasons provided in the Amendment filed December 26, 2007, the entire contents of which being incorporated herein by reference.

Rather that reiterate the substance of the previously filed response, Applicants will focus on the "Response to Arguments", paragraph 4 of the outstanding Office Action. Essential to the Office Action's conclusion of obviousness is relevant prior art is the assertion that "there is no teaching in Callahan that concludes the transformation must be performed by incorporating the intermediate step". According to *KSR*, the Office Action concludes that the "known method of a direct conversion of a structured document into another document, as taught by Nussbaum, with the conversion rule information of Callahan, in order to produce the predictable result of a new structured document, would have been obvious to one of ordinary skill in the art at the time of the invention."

Applicants respectfully traverse this analysis because the Office Action is relying on the first exemplary rationale to form a *prima facie* case of obviousness according to M.P.E.P. § 2143, but the present facts do not support this rationale. Moreover, the Office Action is alleging that "(a) combining prior art elements according to known methods to yield predictable results" is applicable in the present situation. However, the alleged combination cannot render the applied prior art unsatisfactory for its intended purpose (M.P.E.P. § 2145(X)(d)). Such is the case with the assertion made in the outstanding Office Action.

Moreover, Applicants content that <u>Callahan</u> must perform the intermediate transformation step (see e.g., step 610 in Figure 6) as an essential element to achieving <u>Callahan</u>'s desired result. Moreover, <u>Callahan</u> explains in [0065] that "XML schema 512 are annotated with semantic actions that direct the transformation process, and these semantic actions generate XSLT in much the same way that a compiler produces machine or byte code." Additionally, in [0058] <u>Callahan</u> explains that "by treating XSLT style sheets as the 'assembly code' of the transform process, a semantic firewall is easily reconfigurable." Furthermore, in [0059] <u>Callahan</u> explains that the "constraint-based approach of <u>the invention</u> allows the semantic firewall to be easily configured by system administration and management personnel ...".

Thus, based on the teachings in <u>Callahan</u>, Applicants disagree with the Office Action's assertion at page 15 that it is merely an optional step in <u>Callahan</u> to create an annotated, intermediate file.

Consequently, in view of the present remarks and in light of the further remarks provided in the previously filed amendment, it is respectfully submitted that the invention defined by Claims 1-33 patentably defines over the asserted prior art. The present application is therefore believed to be in condition for formal allowance and an early and favorable reconsideration of this application is therefore requested.

Respectfully submitted,

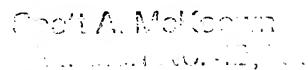OBLON, SPIVAK, McCLELLAND,
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